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August 3, 2022

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The Honorable Alan S. Trust  
United States Bankruptcy Court  
Eastern District of New York  
Alfonse M. D'Amato Federal Courthouse  
290 Federal Plaza  
Central Islip, New York 11722

**Re: In re Orion HealthCorp, Inc., et al.  
Howard M. Ehrenberg v. Arvind Walia;  
Niknim Management Inc.  
USBC EDNY Adv. Proc. No. 20-08049-ast**

Dear Judge Trust:

We are counsel for Howard M. Ehrenberg in his capacity as Liquidating Trustee of Orion Healthcorp, Inc., *et al.* (the "Liquidating Trustee") in the above referenced adversary proceeding. We write to advise the Court of an impasse, status and that each side has submitted declarations on the issue.

The parties participated in a mediation session with Judge Rosen and which did not result in a settlement. After that mediation, the parties continued to engage in settlement discussions, but are not close to a resolution. Further delay will not result in a settlement. The scheduling order proposed by the Liquidating Trustee provides the same time-lines anticipated by the parties before expert discovery was paused to accommodate mediation.

The Liquidating Trustee will cause this letter to be served on the Office of the United States Trustee and all other parties entitled to receive notice.

Very truly yours,

/s/ Jeffrey P. Nolan  
Jeffrey P. Nolan

:lsc



August 3, 2022  
Page 2

cc: Sanford P. Rosen, Esq., Paris Gyparakis, Esq. (Via ECF)  
(Counsel for Defendants)